

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

HYNIX SEMICONDUCTOR INC.; HYNIX SEMICONDUCTOR AMERICA, INC.; HYNIX SEMICONDUCTOR U.K. LTD.; and HYNIX SEMICONDUCTOR DEUTSCHLAND GmbH,

Plaintiffs,

vs.

RAMBUS INC.,

Defendant.

CASE NO. C 00-20905 RMW

~~PROPOSED~~ ORDER AND STIPULATION EXTENDING TIME

Judge: Hon Ronald M. Whyte

---

RAMBUS INC.,

CASE NO. C 05-00334 RMW

Plaintiff,

vs.

HYNIX SEMICONDUCTOR INC., HYNIX SEMICONDUCTOR AMERICA INC., HYNIX SEMICONDUCTOR MANUFACTURING AMERICA INC.,

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG SEMICONDUCTOR, INC., SAMSUNG AUSTIN SEMICONDUCTOR, L.P.,

NANYA TECHNOLOGY CORPORATION, NANCY TECHNOLOGY CORPORATION U.S.A.,

Defendants.

---

RAMBUS INC.,

CASE NO. C 05-02298 RMW

Plaintiff,

vs.

SAMSUNG ELECTRONICS CO., LTD., SAMSUNG ELECTRONICS AMERICA, INC., SAMSUNG SEMICONDUCTOR, INC., SAMSUNG AUSTIN SEMICONDUCTOR, L.P.,

Defendants.

1

2

3

RAMBUS INC.,

4

Plaintiff,

5

vs.

6

MICRON TECHNOLOGY, INC., and  
MICRON SEMICONDUCTOR PRODUCTS,  
INC.,

7

Defendants.

8

9

10

**STIPULATION AND PROPOSED ORDER EXTENDING TIME**

11

12

13

Whereas the Court entered a Joint Case Management Order ("CMO") on April 24,  
2007;

14

15

Whereas the CMO provides that July 20, 2007 is the date on which the party or  
parties with the burden of proof on an issue is required to provide an expert report on that issue;

16

17

Whereas the CMO set August 17, 2007 as the date on which the parties are  
required to provide rebuttal expert disclosures and reports;

18

19

Whereas the expert discovery cutoff set forth in the CMO is September 17, 2007;

20

21

Whereas the CMO set October 1, 2007 as the last day to file summary judgment  
and Daubert motions;

22

23

Whereas, on June 27, 2007, the Court scheduled a further case management  
conference to take place on November 7, 2007;

24

25

Whereas Micron Technology, Inc., Micron Semiconductor Products, Inc., Hynix  
Semiconductor, Inc., Hynix Semiconductor America, Inc., Hynix Semiconductor U.K., Ltd.,  
Hynix Semiconductor Deutschland, GmbH, Samsung Electronics Co., Ltd., Samsung Electronics  
America, Inc., Samsung Semiconductor, Inc., Samsung Austin Semiconductor, L.P., Nanya  
Technology Corporation and Nanya Technology Corporation USA (collectively the  
"Manufacturers") and Rambus Inc. served their expert disclosures on June 22, 2007;

26

27

28

CASE NO. C 06-00244 RMW

1 Whereas the Manufacturers' experts require additional time to complete their expert  
2 reports;

3 Whereas the Manufacturers requested a twelve-day extension of time to submit any  
4 party's initial expert report(s), and Rambus Inc. agreed to the Manufacturers' request;

5 Whereas Rambus in turn requested a twenty-four-day extension of the time to  
6 submit any party's rebuttal report(s), and the Manufacturers agreed to Rambus's request;

7 Whereas the parties have agreed, subject to the Court's approval, to modify the  
8 schedule set forth in the Joint Case Management Order dated April 24, 2007;

9 NOW therefore, it is hereby AGREED and STIPULATED, by and among the  
10 parties hereto through their undersigned counsel, that: (i) the date on which the party or parties  
11 with the burden of proof on an issue shall provide an expert report on that issue is moved from  
12 July 20, 2007 to August 1, 2007; (ii) the date on which the parties shall provide rebuttal expert  
13 disclosures and reports is moved from August 17, 2007 to September 10, 2007; (iii) the last day  
14 for expert discovery is moved from September 17, 2007 to October 8, 2007; (iv) the last day to  
15 file summary judgment and Daubert motions is moved from October 1, 2007 to October 17, 2007;  
16 and (vi) the further case management conference and the hearing date for summary judgment and  
17 Daubert motions is moved from November 7, 2007 to November 21, 2007.

18  
19 SO ORDERED,

20 DATED: 7/16/07



21  
22  
23  
24  
25  
26  
27  
28 HON. RONALD M. WHYTE

1  
2  
3 DATED: July 12, 2007

Respectfully submitted,

4  
5 FOR THE MANUFACTURERS

6 By /s/ Hal Barza

7 Harold A. Barza

8 William Price

9 Robert Becher

10 QUINN EMANUEL URQUHART OLIVER & HEDGES

11 865 South Figueroa Street, 10th Floor

12 Los Angeles, California 90017-2543

13 Jared Bobrow

14 John D. Beynon

15 WEIL, GOTSHAL & MANGES LLP

16 Redwood Shores, CA 94065

17 Attorneys for

18 MICRON TECHNOLOGY, INC., and

19 MICRON SEMICONDUCTOR PRODUCTS, INC.

20 By /s/ Anita Kadala

21 David J. Healey

22 Anita E. Kadala

23 WEIL, GOTSHAL & MANGES LLP

24 Houston, TX 77002

25 Alan J. Weinschel

26 WEIL, GOTSHAL & MANGES LLP

27 New York, NY 10153

28 Matthew D. Powers

29 Edward R. Reines

30 WEIL, GOTSHAL & MANGES LLP

31 Redwood Shores, CA 94065

32 Attorneys for

33 SAMSUNG ELECTRONICS CO., LTD.,

34 SAMSUNG ELECTRONICS AMERICA, INC.,

35 SAMSUNG SEMICONDUCTOR, INC., and

36 SAMSUNG AUSTIN SEMICONDUCTOR, L.P.

37 By /s/ Robert Freitas

38 Robert E. Freitas

39 Kai Tseng

40 Craig R. Kaufman

41 Denise M. Mingrone

42 ORRICK, HERRINGTON & SUTCLIFFE LLP

43 Menlo Park, CA 94025

44 Attorneys for

45 NANYA TECHNOLOGY CORPORATION and NANYA

46 TECHNOLOGY CORPORATION U.S.A.

1

2

3

By /s/ Susan van Keulen  
Theodore G. Brown, III  
Susan van Keulen  
TOWNSEND and TOWNSEND and CREW LLP  
379 Lytton Avenue  
Palo Alto, California 94301

4

5

6

Attorneys for  
HYNIX SEMICONDUCTOR INC., HYNIX SEMICONDUCTOR  
AMERICA INC., HYNIX SEMICONDUCTOR  
MANUFACTURING AMERICA INC., HYNIX  
SEMICONDUCTOR U.K. LTD., and HYNIX  
SEMICONDUCTOR DEUTSCHLAND GmbH

7

8

9

10 DATED: July 12, 2007 FOR RAMBUS INC.

11

12

13

14 By /s/  
15 Carolyn Hoecker Luedtke  
16 MUNGER, TOLLES & OLSON LLP  
17 560 Mission Street, 27<sup>th</sup> Floor  
18 San Francisco, CA 94105

19

20

21

22

23

24

25

26

27

28

1

2 **Notice of this document has been electronically sent to:**

3 **Counsel for Plaintiff(s):**

4 Craig N. Tolliver ctolliver@mckoolsmith.com  
5 Pierre J. Hubert phubert@mckoolsmith.com  
6 Brian K. Erickson berickson@dbllp.com,  
7 David C. Vondle dvondle@akingump.com  
8 Gregory P. Stone gregory.stone@mto.com  
Carolyn Hoecker Luedtke luedtkech@mto.com  
Peter A. Detre detrepa@mto.com  
Burton Alexander Gross burton.gross@mto.com,  
Steven McCall Perry steven.perry@mto.com  
Jeannine Y. Sano sanoj@howrey.com

9  
10 **Counsel for Defendant(s):**

11 Matthew D. Powers matthew.powers@weil.com  
12 David J. Healey david.healey@weil.com  
Edward R. Reines Edward.Reines@weil.com  
13 John D Beynon john.beynon@weil.com  
Jared Bobrow jared.bobrow@weil.com  
Leeron Kalay leeron.kalay@weil.com  
14 Theodore G. Brown, III tgbrown@townsend.com  
Daniel J. Furniss djfurniss@townsend.com  
Jordan Trent Jones jtjones@townsend.com  
15 Kenneth L. Nissly kennissly@thelenreid.com  
Geoffrey H. Yost gyost@thelenreid.com  
16 Susan Gregory van Keulen svankeulen@thelenreid.com  
Patrick Lynch plynch@omm.com  
17 Jason Sheffield Angell jangell@orrick.com  
Vickie L. Feeman vfeeman@orrick.com  
18 Mark Shean mshean@orrick.com  
Kai Tseng hlee@orrick.com

19  
20 Counsel are responsible for distributing copies of this document to co-counsel that have not  
21 registered for e-filing under the court's CM/ECF program.

22 **Dated:** 7/16/07

SPT  
**Chambers of Judge Whyte**

23

24

25

26

27

28